



U.S. Department  
Of Transportation

800 Independence Ave., SW.  
Washington, DC 20591

**Federal Aviation  
Administration**

April 18, 2002

ALL FLIGHT TRAINING DEVICE MANUFACTURER'S

This letter is directed to the manufacturers of generic flight training devices (FTD) for which at least one model is known to have been qualified and approved by the Federal Aviation Administration (FAA) to meet Level 2 or above standards in accordance with Advisory Circular (AC) No. 120-45A.

The purpose of this letter is to correct a misunderstanding believed prevalent relating to specific Letters of Authorization (LOA) issued by the General Aviation and Commercial Division (AFS-800). These LOA are issued by AFS-800, granting a Level 1 equivalent use authorization for those FTD for which Level 3 qualification and approval is being sought by either the manufacturers or owner/operators of these devices, and specifically for those FTD manufactured after August 6, 1996.

During the latter part of 2000, several manufacturers and owner/operators of devices intended as FTD were seeking qualification and approval of newly manufactured models of their FTD to meet Level 3 standards by application to the Manager, National Simulator Program, AFS-205, Atlanta, Georgia. Because of the often lengthy process in gaining qualification and approval to meet Level 3 standards the manufacturers requested that AFS-800 grant a Level 1 equivalent use authorization for these devices while qualification and approval to meet Level 3 standards was being sought. It should be noted that the authorized use of these devices, when Level qualified and approved as FTD, would be governed by Title 14 Code of Federal Regulation (14 CFR) section 61.4(a) and the associated Practical Test Standards, rather than 14 CFR section 61.4(b), under which Level 1 FTD are authorized for use.

After consideration of the manufacturers' request, AFS-800 agreed, in an effort to remove any undue burden that might have been placed on the owner/operators of newly manufactured training devices awaiting Level 3 qualification and approval. This agreement was based on the condition that a formal request be submitted by the owner/operator of each such device containing specific information needed to support the request, and provided that an on-site evaluation of each affected model and configuration of the subject devices was conducted to determine whether a Level 1 equivalent use authorization was justified. The first such LOA stating appropriate conditions and limitations was issued by AFS-800 on December 6, 2000. These LOA are issued for a period of 1 year and will not be reissued unless applicable solely to a single-engine conversion to a multiengine FTD.

The following information is to be included in the formal letter of request and will be acted upon by AFS-800 in the order received as work priorities permit:

- (1) The make, model, serial #, and date of manufacture of the device;
- (2) A copy of the letter to AFS-205 requesting Level 2 or above qualification and approval;

- (3) In case of previous qualification and approval at Level 2 or above, the Level at which qualified and date issued, and the Reference Data Report Number; and
- (4) Any modification or configuration change requested (i.e., single-engine conversion and/or Level 1 equivalent use authorization, as appropriate).

Under current FAA policy, any significant modification to an FTD, such as a conversion from multiengine configuration to a single-engine configuration, for use under Federal regulations requires that:

- (1) A conversion kit must be developed for the device to permit the changes from one configuration to another and that it be evaluated and found acceptable by FAA; and
- (2) The FTD must be functionally evaluated in both single-engine and multiengine configurations and determined to be acceptable for use without invalidating either the Level status at which it may currently be qualified and approved, or the Level 1 equivalent authorized use, should such use be granted.

It should be noted that the 1-year period of issuance for these LOA is believed to be sufficient time to permit the owner/operator of the subject device to gain Level 3 status. These FTD, where authorized for use, may be used for both training and testing, and which over-rides the Level 1 authorized use of (conferred status) FTD, which are authorized for use in training only in accordance with 14 CFR section 61.4(b). Thus, a Level 1 equivalent use authorization issued for a multiengine FTD becomes invalid when the FTD meets Level 3 standards. Similarly, where an LOA is issued granting an equivalent use authorization for a device when operated in a multiengine configuration and/or when modified and operated in a single-engine configuration, and the device is subsequently determined to meet Level 3 standards as a multiengine FTD, the Level 1 equivalent use authorization granted in the LOA issued by AFS-800 is valid only when the device is operated as a single-engine FTD.

We regret the circumstances which make this letter necessary and trust that the manufacturers of all affected training devices will share this information with their customers and that it will be helpful in correcting any misunderstanding that may exist concerning this matter, and the conditions and limitations stated in existing LOA.

/signed/  
Michael L. Henry  
for  
Robert A. Wright  
Manager, General Aviation and  
Commercial Division